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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 JOSE GUADALUPE PARRA-AVALOS,  
16 Defendant.

Case No. 2:19-cr-075-APG-CWH

**STIPULATION TO EXTEND  
DEADLINE FOR OBJECTIONS TO  
REPORT AND RECOMMENDATION  
(ECF NO. 21)**  
(First Request)

**ORDER**

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
19 Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney,  
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
21 and Andrew Wong, Assistant Federal Public Defender, counsel for Jose Guadalupe Parra-  
22 Avalos, that the previously ordered deadline for filing of objections to the report and  
23 recommendation (ECF No. 21) be vacated and continued to Friday, June 7, 2019.

24 The Stipulation is entered into for the following reasons:

- 25 1. Defense counsel needs additional time to edit and finalize his objections to the  
26 Report and Recommendation.
2. The defendant is incarcerated and does not object to the continuance.

1           3.       The parties agree to the continuance.

2           4.       The additional time requested herein is not sought for purposes of delay, but  
3 merely to allow counsel for defendant sufficient time to finalize and file his objections.

4           5.       Additionally, denial of this request for continuance could result in a miscarriage  
5 of justice.

6           This is the first stipulation to continue filed herein.

7           DATED this 4<sup>th</sup> day of June, 2019.

8           RENE L. VALLADARES  
9           Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

10           /s/ Andrew Wong  
11 By \_\_\_\_\_

/s/ Kimberly M. Frayn  
By \_\_\_\_\_

12           ANDREW WONG  
Assistant Federal Public Defender

KIMBERLY M. FRAYN  
Assistant United States Attorney

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**ORDER**

IT IS FURTHER ORDERED, that defense counsel shall have to and including June 7, 2019 to file any objections to the report and recommendation.

Dated: June 4, 2019.



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UNITED STATES DISTRICT JUDGE